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8 *Attorneys for Defendants Grand Canyon University;  
Grand Canyon Education, Inc.; Grand Canyon University  
Campus Police; and Brian Mueller*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF ARIZONA**

11 Kino Bonelli,

12 Case No. 2:20-cv-00143-SMB

13 Plaintiff,

14 v.

15 **NOTICE OF NON-PARTIES AT  
16 FAULT**

17 (Assigned to Honorable Susan M.  
18 Brnovich)

19 Grand Canyon University; Grand Canyon  
20 Education, Inc.; Grand Canyon University  
21 Campus Police and Public Safety; Brian  
22 Mueller; Joe Yahner; Kenny Byers;  
23 Michael Martinez; Officer Robinson;  
24 Officer Washington; Sergeant Bristle;  
25 Sergeant Wiley; Officer M. Grupe; And  
26 Steve Young, Individually, and in their  
27 capacity as officers and agents for Grand  
Canyon University and Grand Canyon  
University, Inc.,

28 Defendants.

29  
30 Defendants Grand Canyon University; Grand Canyon Education, Inc.; Grand Canyon  
31 University Campus Police; and Brian Mueller (collectively “GCU Defendants”) by and  
32 through undersigned counsel, hereby file this notice of non-party at fault.

33 GCU Defendants make this disclosure pursuant to *Rosner v. Denim & Diamonds*, 188  
34 Ariz. 431, 937 P.2d 353 (App. 1996). To the extent that ongoing discovery uncovers the fault  
35 of a non-party in this matter, GCU Defendants reserve the right to amend this notice and name  
36 non-parties at fault.

37 1. Unidentified Persons or Entities

1 Plaintiff claims that he has suffered emotional and physical stress due to the alleged  
2 actions of GCU. To the extent that discovery uncovers other persons or entities who caused or  
3 contributed to Plaintiff's emotional and physical distress, that person or entity is a non-party at  
4 fault.

5 Plaintiff also claims that due to GCU's actions, his grades suffered and he could not  
6 obtain meaningful employment after graduation. To the extent that discovery uncovers other  
7 persons or entities who had a negative impact on Plaintiff's grades or employment, that person  
8 or entity is a non-party at fault.

9 Plaintiff also claims that he incurred a loss of reputation, shame, embarrassment,  
10 humiliation, mental anguish, and lost wages. To the extent that discovery uncovers other  
11 persons or entities who had caused or contributed to these damages, that person or entity is a  
12 non-party at fault.

14 DATED: September 8, 2020

**MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP**

16 By: *s/Nishan J. Wilde*

17 Robert B. Zelms

18 Nishan J. Wilde

19 *Attorneys for Defendants Grand Canyon  
University; Grand Canyon Education, Inc.;  
Grand Canyon University Campus Police; and  
Brian Mueller*

MANNING & KASS  
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ATTORNEYS AT LAW

1 CERTIFICATE OF SERVICE

2 I hereby certify that on this 8<sup>th</sup> day of September, 2020, I electronically filed the  
3 foregoing, using the CM/ECF system, which served the following CM/ECF participants:

4  
5 Krista R. Hemming  
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10 (Pro Hac Vice Approved 12/4/2019)  
11 *Attorney for Plaintiff*

12 *s/ Diana Drake*

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